

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JANET MONGE,

Plaintiff,

- against -

UNIVERSITY OF PENNSYLVANIA, et al.

Defendants.

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No. 22-cv-2942-GEKP

ORDER

AND NOW, this _____ day of August, 2022, it is hereby **ORDERED** that the Motion to Allow Alexandra M. Settlemayer to Appear *Pro Hac Vice* is **GRANTED**, and Alexandra M. Settlemayer may appear as counsel for the parties designated in the caption of this matter as NYP Holdings, Inc., d/b/a New York Post, Teen Vogue, The New Yorker, Slate, Guardian Media Group, d/b/a the Guardian, The New York Times Company, Daily Mail and General Trust, PLC, d/b/a Daily Mail, Heather Ann Thompson, Ed Pilkington, Adam Schrader, Elain Ayer, Jackson O'Bryan, Ezra Lerner and Michael Levenson.

Honorable Gene E.K. Pratter

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JANET MONGE,

Plaintiff,

- against -

UNIVERSITY OF PENNSYLVANIA, AMY GUTMANN,
WENDELL PRITCHETT, KATHLEEN MORRISON,
DEBORAH THOMAS, and CHRISTOPHER WOODS, in their
individual capacities, PAUL MITCHELL, BILLY PENN, MAYA
KASUTTO, in her individual capacity, THE PHILADELPHIA
INQUIRER, PBC, ABDUL ALIY MUHAMMAD, and JENICE
ARMSTRONG, in their individual capacities, THE NEW
YORKER, HEATHER ANN THOMPSON, in her individual
capacity, ESPN, INC. d/b/a ANDSCAPE, NICOLE FROIO, and
LINN WASHINGTON, in their individual capacities, THE
AMERICAN ANTHROPOLOGICAL ASSOCIATION, THE
SOCIETY OF BLACK ARCHAEOLOGISTS, THE GUARDIAN
MEDIA GROUP d/b/a THE GUARDIAN, ED PILKINGTON, in
his individual capacity, DAILY MAIL AND GENERAL TRUST,
PLC d/b/a DAILY MAIL, ADAM SCHRADER, in his individual
capacity, SLATE, ELAINE AYERS, in her individual capacity,
NYP HOLDINGS, INC. d/b/a NEW YORK POST, JACKSON
O' BRYAN, in his individual capacity, TEEN VOGUE, EZRA
LERNER, in his individual capacity, HYPERALLERGIC
MEDIA, KINJAL DAVE, and JAKE NUSSBAUM, in their
individual capacities, NORA MCGREEVY, AL DIA NEWS,
BRITTANY VALENTINE, in her individual capacity, NEW
YORK TIMES, CO., and MICHAEL LEVENSON, in his
individual capacity,

Defendants.

No. 22-cv-2942-GEKP

**MOTION TO ALLOW THE APPEARANCE OF
ALEXANDRA M. SETTELMAYER PRO HAC VICE**

Pursuant to Local Rule of Civil Procedure 83.5 and the Court's *General Pretrial
and Trial Procedures*, the undersigned attorney, Andrew A. Chirls of Fineman Krekstein & Harris,
P.C., respectfully moves the Court for an order granting admission *pro hac vice* to Alexandra M.

Settlemayer in the above-captioned action. Ms. Settlemayer seeks to act as additional counsel for Defendants Advanced Publications, Inc. d/b/a The New Yorker and Teen Vogue, Ezra Lerner, Heather A. Thompson, Associated Newspapers Limited d/b/a The Daily Mail, Adam Schrader, ESPN Inc. d/b/a Andscape, Linn Washington, Nicole Froio, Guardian News & Media Limited d/b/a The Guardian, Ed Pilkington, NYP Holdings, Inc. d/b/a New York Post, Jackson O'Bryan a/k/a Blake Montgomery, The New York Times Co., Michael Levenson, Slate Group LLC, and Elaine Ayers. In support of this Motion, the undersigned states the following:

1. I entered my appearance in this matter on August 28, 2022.
2. Alexandra M. Settlemayer is an Associate with the firm Davis Wright Tremaine LLP with an office location at 1251 Avenue of the Americas, New York, New York 10020, Tel. (212) 489-8230, Fax (212) 489-8340, email: alexandrasettelmayer@dwt.com.
3. The Declaration of Alexandra M. Settlemayer is attached to this motion as "Exhibit A."
4. My Sponsor's Declaration in support of this motion seeking leave for Alexandra M. Settlemayer to appear *pro hac vice* is attached to this motion as "Exhibit B."

WHEREFORE, the undersigned counsel respectfully requests that this Court enter an order granting Alexandra M. Settlemayer to appear *pro hac vice* for purposes of this action only.

Dated: August 5, 2022

Respectfully submitted,
FINEMAN KREKSTEIN & HARRIS, P.C.

/s/ Andrew A. Chirls
Andrew A. Chirls
Ten Penn Center
1801 Market Street, Suite 1140
Philadelphia, PA 19103
Tel: (215) 893-8715
Email: achirls@finemanlawfirm.com

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JANET MONGE,

Plaintiff,

- against -

UNIVERSITY OF PENNSYLVANIA, AMY GUTMANN,
WENDELL PRITCHETT, KATHLEEN MORRISON,
DEBORAH THOMAS, and CHRISTOPHER WOODS, in their
individual capacities, PAUL MITCHELL, BILLY PENN, MAYA
KASUTTO, in her individual capacity, THE PHILADELPHIA
INQUIRER, PBC, ABDUL ALIY MUHAMMAD, and JENICE
ARMSTRONG, in their individual capacities, THE NEW
YORKER, HEATHER ANN THOMPSON, in her individual
capacity, ESPN, INC. d/b/a ANDSCAPE, NICOLE FROIO, and
LINN WASHINGTON, in their individual capacities, THE
AMERICAN ANTHROPOLOGICAL ASSOCIATION, THE
SOCIETY OF BLACK ARCHAEOLOGISTS, THE GUARDIAN
MEDIA GROUP d/b/a THE GUARDIAN, ED PILKINGTON, in
his individual capacity, DAILY MAIL AND GENERAL TRUST,
PLC d/b/a DAILY MAIL, ADAM SCHRADER, in his individual
capacity, SLATE, ELAINE AYERS, in her individual capacity,
NYP HOLDINGS, INC. d/b/a NEW YORK POST, JACKSON
O' BRYAN, in his individual capacity, TEEN VOGUE, EZRA
LERNER, in his individual capacity, HYPERALLERGIC
MEDIA, KINJAL DAVE, and JAKE NUSSBAUM, in their
individual capacities, NORA MCGREEVY, AL DIA NEWS,
BRITTANY VALENTINE, in her individual capacity, NEW
YORK TIMES, CO., and MICHAEL LEVENSON, in his
individual capacity,

Defendants.

No. 22-cv-2942-GEKP

**DECLARATION OF ALEXANDRA M. SETTELMAYER IN SUPPORT OF
APPLICATION FOR ADMISSION *PRO HAC VICE***

Alexandra M. Settelmayer, of full age, hereby deposes and says:

1. I have personal knowledge of the matters set forth herein.
2. I am an Associate with the law firm Davis Wright Tremaine LLP with an office location

at 1251 Avenue of the Americas, New York, New York 10020, Tel. (212) 489-8230, Fax (212) 489-8340, email: alexandrasettelmayer@dwt.com.

3. I make this Declaration in support of the application seeking leave for me to appear *pro hac vice* in the above-captioned action as an attorney for Defendants Advanced Publications, Inc. d/b/a The New Yorker and Teen Vogue, Ezra Lerner, Heather A. Thompson, Associated Newspapers Limited d/b/a The Daily Mail, Adam Schrader, ESPN Inc. d/b/a Andscape, Linn Washington, Nicole Froio, Guardian News & Media Limited d/b/a The Guardian, Ed Pilkington, NYP Holdings, Inc. d/b/a New York Post, Jackson O'Bryan a/k/a Blake Montgomery, The New York Times Co., Michael Levenson, Slate Group LLC, and Elaine Ayers.

4. I was admitted to practice law in the State of New York in 2018. I was also admitted to practice in the following federal jurisdictions in the years indicated below:

- U.S. District Court, Eastern District of New York (2018);
- U.S. District Court, Southern District of New York (2020);
- U.S. Court of Appeals, Second Circuit (2018).

5. I am a member in good standing in all jurisdictions to which I am admitted.

6. I have never been suspended from the practice of law in any jurisdiction or received any public reprimand by the highest disciplinary authority of any bar in which I have been a member.

7. I have reviewed the most recent edition of the *Pennsylvania Rules of Professional Conduct* and the *Local Rules of Civil Procedure for the United States District Court for the Eastern District of Pennsylvania*, and I agree to be bound by both sets of Rules for the duration of the case for which *pro hac vice* admission is sought.

8. I understand that my *pro hac vice* will not relieve local counsel, Andrew A. Chirls, of responsibility for this case in matters before the Court.

9. If granted *pro hac vice* status, I will in good faith continue to advise counsel who has moved for the *pro hac vice* admission, Andrew A. Chirls, of the current status of the above-captioned case and of all material developments therein.

I declare, pursuant to 28 U.S.C § 1746, under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 5, 2022.

/s/ **Alexandra M. Settelmayer**

Alexandra M. Settelmayer

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JANET MONGE,

Plaintiff,

- against -

UNIVERSITY OF PENNSYLVANIA, AMY GUTMANN,
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KASUTTO, in her individual capacity, THE PHILADELPHIA
INQUIRER, PBC, ABDUL ALIY MUHAMMAD, and JENICE
ARMSTRONG, in their individual capacities, THE NEW
YORKER, HEATHER ANN THOMPSON, in her individual
capacity, ESPN, INC. d/b/a ANDSCAPE, NICOLE FROIO, and
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AMERICAN ANTHROPOLOGICAL ASSOCIATION, THE
SOCIETY OF BLACK ARCHAEOLOGISTS, THE GUARDIAN
MEDIA GROUP d/b/a THE GUARDIAN, ED PILKINGTON, in
his individual capacity, DAILY MAIL AND GENERAL TRUST,
PLC d/b/a DAILY MAIL, ADAM SCHRADER, in his individual
capacity, SLATE, ELAINE AYERS, in her individual capacity,
NYP HOLDINGS, INC. d/b/a NEW YORK POST, JACKSON
O' BRYAN, in his individual capacity, TEEN VOGUE, EZRA
LERNER, in his individual capacity, HYPERALLERGIC
MEDIA, KINJAL DAVE, and JAKE NUSSBAUM, in their
individual capacities, NORA MCGREEVY, AL DIA NEWS,
BRITTANY VALENTINE, in her individual capacity, NEW
YORK TIMES, CO., and MICHAEL LEVENSON, in his
individual capacity,

Defendants.

No. 22-cv-2942-GEKP

**SPONSOR'S DECLARATION IN SUPPORT OF MOTION
FOR ADMISSION *PRO HAC VICE* OF ALEXANDRA M. SETTELMAYER**

Andrew A. Chirls, of full age, hereby deposes and says:.

1. I have personal knowledge of the matters set forth herein.
2. I am a member of the law firm Fineman Krekstein & Harri,s P.C., Ten Penn Center,

1801 Market Street, Suite 1140, Philadelphia, PA 19103, Tel: (215) 893-8715.

3. I am admitted to practice in the Commonwealth of Pennsylvania and the U.S. District Court for the Eastern District of Pennsylvania.

4. I am in good standing in all jurisdictions to which I am admitted.

5. I make this Affidavit in support of the motion and application to admit Alexandra M. Settlemayer *pro hac vice* to appear and participate in this matter as an attorney for Defendants Advanced Publications, Inc. d/b/a The New Yorker and Teen Vogue, Ezra Lerner, Heather A. Thompson, Associated Newspapers Limited d/b/a The Daily Mail, Adam Schrader, ESPN Inc. d/b/a Andscape, Linn Washington, Nicole Froio, Guardian News & Media Limited d/b/a The Guardian, Ed Pilkington, NYP Holdings, Inc. d/b/a New York Post, Jackson O'Bryan a/k/a Blake Montgomery, The New York Times Co., Michael Levenson, Slate Group LLC, and Elaine Ayers pursuant to Local Rule of Civil Procedure 83.5.2(b).

10. Alexandra M. Settlemayer is an Associate with the firm Davis Wright Tremaine LLP with an office location at 1251 Avenue of the Americas, New York, New York 10020, Tel. (212) 489-8230, Fax (212) 489-8340, email: alexandrasettlemayer@dwt.com.

11. I certify that I know that the applicant, Alexandra M. Settlemayer, is a member in good standing of the state and federal court jurisdictions included in Exhibit A – the Affidavit of Alexandra M. Settlemayer in Support of Application for Admission *Pro Hac Vice*.

12. I understand that the admission *pro hac vice* of Alexandra M. Settlemayer will not relieve me of legal duties and responsibility for this case in matters before the Court.

I declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 5, 2022

/s/ *Andrew A. Chirls*

Andrew A. Chirls

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above has been served electronically on all counsel of record via the Court's ECF system on August 5, 2022.

/s/ *Andrew A. Chirls*

Andrew A. Chirls